

AFFIDAVIT

COMES NOW Benjamin Morley, after being duly deposed and sworn, does hereby state under oath as follows:

1. I continue to be subjected to mandatory DEI indoctrination at VR, and to be encouraged to engage in DEI trainings.
2. Trainings, even when not mandatory, are encouraged by leadership, and, based on my experience at the Department of Corrections, I know that attending non-mandatory trainings is viewed favorably on employee evaluations.
3. Heather Batalion schedules DEI related trainings that are occurring every month since last spring. I have not attended these trainings, but feel pressure to do so.
4. Even if the trainings are not specifically advertised as DEI trainings, every training that I have attended since Valerio's trainings includes some form of racial equity or race essentialism.
5. On October 29, 2021 I attended a 6 hour "Ethics in Motivational Interviewing training." The trainer brought up "Diversity, Equity and Inclusion". He said that employees need to use DEI to "dismantle systemic racism".
6. On November 17th, 2021, we were required to attend a "resilience training". That training involved discussions about racial equity and white supremacy. We were told that "some people think that resilience is pulling yourself up your bootstraps, but that is a white supremacy concept we need to move away from." The trainer also stated that "resilience is needed to defeat systemic racism in our society".
7. I felt this was another attempt to attack white people, both by claiming there is systemic racism in our society, and by denigrating a value that I have held

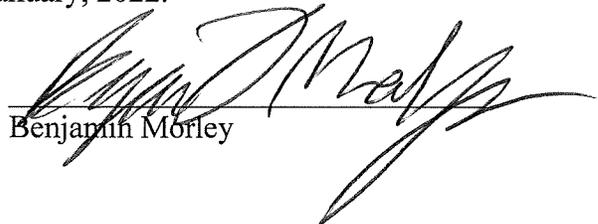
sincerely all my life, and have applied to my own life experience—namely pulling oneself up by boot straps.

8. On November 24, 2021, Lauren Dillon, a VR transition counselor, handed out to all the employees in my office Ibram Kendi's book, "How to be an Anti-Racist". She came to my office, and hand delivered me a copy. When I declined, she said "Really? are you sure you don't want it?" I felt pressure to take the book.
9. On December 16, 2021, we received in our office mailboxes "White Fragility" by Robin D'Angelo.
10. I recently complained to Dianne Dalmasse, Kelley Knowlton, Director of HR, and Elizabeth Harrington about receiving the two books noted . They have not addressed my concerns.
11. After the complaint was filed, regional manager Liz Harrington appointed herself as my direct supervisor. Prior to that, Karen Blake-Orne was my supervisor, and we met once a week for case reviews and to obtain security and approvals. Now Liz attends the case reviews with Karen. As my direct supervisor, Liz repeatedly criticizes my work, but refuses to discuss her criticisms. It's as if she is building a dossier against me. Many of her accusations are either not substantive, or are just wrong. For example, last week she sent me an email accusing me of denying services to two consumers, and telling me to send letters to the consumers denying services and telling them to connect to CAP (Client Assistance Program). If CAP is involved, they can make an additional appraisal of my work as counselor, which would impact my performance evaluations negatively. Denial of service means denial of eligibility of a specific service. I did not deny services to these clients.

She has also falsely accused me of not working a 40 hour week. She has also been calling my consumers, without talking to me first, something that has never happened before. She is using policies and procedures to unfairly criticize me, but she will not discuss the issues with me. I have repeatedly asked to talk to her about her accusations, and she has declined. In fact, I have not been able to talk to her verbally since at least August.

12. I am afraid of any disciplinary action if I speak up about DEI. I complained last spring about the trainings, and was reprimanded for it. In addition, when I complained about the books provided to us several weeks ago, I have received no substantive response. Finally, my work is being scrutinized and criticized to a greater degree than before, and to a much greater degree than other VR counselors.

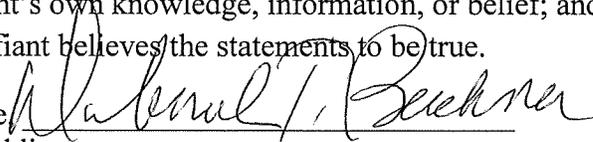
Dated at Walden, Vermont this 4th day January, 2022.


Benjamin Morley

**STATE OF VERMONT
CALEDONIA COUNTY, SS.**

At Walden Vermont this 4th day of January, 2021 personally appeared Benjamin Morley and, upon oath duly administered, declared the foregoing statements by him/her/them to be on the affiant's own knowledge, information, or belief; and, so far as upon information and belief, the affiant believes the statements to be true.

Before me
Notary Public
Credential #



157.0010941

My Commission expires: 2/31/23